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## COMMISSIONERS

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ORIGINAL

CORP COMMISSION  
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF  
TABLE TOP TELEPHONE COMPANY, INC., A  
NEVADA CORPORATION, FOR A HEARING  
TO DETERMINE THE EARNINGS OF THE  
COMPANY, THE FAIR VALUE OF THE  
COMPANY FOR RATEMAKING PURPOSES,  
AND TO INCREASE RESIDENTIAL RATES AS  
NECESSARY TO COMPENSATE FOR THE  
RATE IMPACTS OF THE FCC'S USE/ICC  
TRANSFORMATION ORDER

DOCKET NO. T-02724A-13-0416

**RESPONSE TO CUSTOMER  
COMMENT**

Table Top Telephone Company, Inc. hereby files a copy of its response to Informal  
Complaints No. 2014-115662 and 2014-115716 submitted by Harvey Roberts. A copy of  
Complaint No. 2014-115662 was filed in the above-captioned docket as a customer comment on  
April 15, 2014.

Craig A. Marks  
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Attorney for Table Top Telephone Company, Inc.

**Original** and 13 copies **filed**  
on April 15, 2014, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

Arizona Corporation Commission

DOCKETED

APR 15 2014

DOCKETED BY

**Copies e-mailed** on April 15, to:

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TABLE TOP  
TELEPHONE COMPANY, INC.

April 10, 2014

Ms. Deb Reagan  
Arizona Corporation Commission  
1200 W. Washington St.  
Phoenix, AZ 85007

Re: Complaints No. 2014-115662 and 2014-115716 filed by Mr. Harvey Roberts

Dear Ms. Reagan,

We have concluded our investigation of Complaints No. 2014-115662 and 2014-115716 for Harvey Roberts, and submit the following response:

In his claim, Mr. Roberts states that Table Top Telephone (Table Top) has restricted the local calling service area. Table Top has not taken any action to restrict the local calling area in the Inscription Canyon Ranch (ICR) exchange. Table Top offers extended area service (EAS) to several NXX's in the Century Link Prescott exchange which are toll free. In fact, in the past Table Top has requested that Century Link consider including the Table Top ICR exchange NXX as part of their EAS. To date, Century Link has denied this request. As a result, calls placed from the Century Link exchange to the Table Top ICR exchange are rated as long distance calls.

Mr. Roberts also expressed a concern with long distance rates. Table Top offers long distance carrier equal access to our customers in which they can select the long distance carrier that best meets their needs. Customers may pre-subscribe to a long distance carrier. Long distance rates vary by carrier and are not determined by Table Top. Our Customer Service Manager contacted Mr. Roberts on April 12, 2014 specifically to clarify the concern identified in his letter as, "calling connections to the latest 3 digit exchanges". We were able to confirm with Mr. Roberts that he was referencing NXX's which are long distance rated from his Table Top telephone number. He has not had any issue placing calls.

On December 19, 2011, our records indicate an investigation into the call termination issues reported by Mr. Roberts. At that time, Mr. Roberts complained that he was not receiving calls from outside the Table Top exchange. A review of our local switch records revealed that the calls in question were not presented to our switch for termination. As a result, we enlisted Century Link to search the records in their Phoenix tandem to determine if calls destined for the Table Top switch and Mr. Roberts's number were reaching their switch. Century Link was unable to confirm these calls reached their switch. It was suggested to Mr. Roberts that the calling party could use an alternate carrier by casual dialing, utilizing the 1010 code, to determine if the calling party's long distance carrier was failing to terminate the call. We do note that the FCC and state regulatory bodies have received countless complaints on the matter of call completion to rural areas. As a result, the FCC issued a 90 page order on the topic November 8, 2013 to address the significant concerns about completion of long distance calls to rural areas, Report and Order and Further Notice of Proposed Rulemaking FCC 13-135. Additionally, the FCC Enforcement Bureau issued an Enforcement Advisory No. 2013-6 on Rural Call Completion on July 19, 2013 to remind long distance providers of their obligations regarding rural call completion. Table Top remains committed to the advocacy and investigation of all call completion issues in support of identifying the root cause of failed call completion.

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Ms. Deb Reagan  
April 14, 2014  
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Should you have any questions or require additional information, please contact Eric J. Vargas, Customer Operations Director, at 559/868-6351.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matthew J. Boos', with a stylized, flowing script.

Matthew J. Boos  
General Manager

Cc: Mr. Harvey Roberts